

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA

ROY S. MOORE

Plaintiffs,

v.

GUY CECIL, et al

Defendants.

Case No.: 4:19-cv-1855

**AMENDED MOTION TO BE ADMITTED *PRO HAC VICE***

Plaintiff Roy Moore (“Judge Moore”), through the undersigned counsel, Melissa L. Isaak, hereby moves for the admission of Larry Klayman, Esq. *pro hac vice* pursuant to Local Rule 83.1(b) for the purposes of appearing as co-counsel on behalf of Roy S. Moore in the above styled matter as offers as follows:

1. This motion is based on the affidavit of Larry Klayman below and attachments thereto.
2. Larry Klayman shall immediately make payment to this Court in the amount of \$75.00 for the payment of his admission fee.
3. The undersigned, anticipated co-counsel in this matter, consents and agrees to all responsibilities detailed in Local Rule 83.1(b)(2) and respectfully requests that this Honorable Court grant this motion for *Pro Hac Vice*.

**Dated:** November 21, 2019

Respectfully Submitted,

/s/ Melissa L. Isaak

Melissa L. Isaak (ASB 4872 A 59I)

[melissa@protectingmen.com](mailto:melissa@protectingmen.com)

The Isaak Law Firm

2815B Zelda Road

Montgomery, AL 36106

(334) 262-8200

## CERTIFICATE OF SERVICE

I hereby certify that on the 21<sup>st</sup> day of November, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

1. **Guy Cecil**  
Priorities USA  
1030 15th Street NW, Suite 950  
Washington DC 20005
2. **Priorities USA**  
1030 15th Street NW, Suite 950  
Washington DC 20005  
Guy Cecil, Chairman
3. **Senate Majority PAC**  
700 13th Street NW, Suite 600  
Washington DC 20005  
J.B. Poersch, President
4. **Bully Pulpit Interactive LLC**  
1750 K Street NW, Suite 450  
Washington, DC 20006  
Andrew Bleeker, President
5. **Waterfront Strategies**  
3050 K Street NW, Suite 100  
Washington DC 20007  
Raelynn Olson, President

/s/ Melissa Isaak  
Counsel for the Plaintiff

**AFFIDAVIT OF LARRY KLAYMAN**

1. I, Larry Klayman, hereby being sworn deposes and says that the following is true and correct and based on my personal knowledge and belief.

2. I am over the age of 18 and mentally and legally competent to make this affidavit, sworn under oath.

3. My residence address for security purposes is 7050 W. Palmetto Park Rd. #15-287, Boca Raton, FL, 33433.

4. My office address is 7050 W. Palmetto Park Rd. #15-287, Boca Raton, FL, 33433. My telephone number is 561-558-5336. My email address is leklayman@gmail.com. My facsimile number is 202-318-8839.

5. I have been admitted to practice before the following courts, as of the following dates. Certificates of Good Standing for The Florida Bar and the District of Columbia Bar are also attached hereto.

U.S. Supreme Court 4/25/88

U.S. Court of Appeals for the District of Columbia 4/22/88

U.S. Court of Appeals for the Ninth Circuit 1/22/00

U.S. District Court for the N. Dist. of TX 8/9/02

U.S. District Court for the S. Dist. of FL 12/29/77

The Florida Bar 12/7/77

The District of Columbia Bar 12/22/80

The Pennsylvania Bar 1/6/1989

6. I am a member in good standing of each of the foregoing courts, except for The Pennsylvania Bar, which I allowed to lapse due to not having completed CLE courses. I am on

administrative suspension and am eligible for reinstatement, should I wish to practice in Pennsylvania.

7. Melissa Isaak, Esq. will serve as local counsel in this matter, should I be admitted *pro hac vice*.

I hereby swear under oath and penalty of perjury that the foregoing facts are true and correct to the best of my knowledge and belief.

Executed on November 21, 2019

/s/ Larry Klayman